

# JacksonLewis

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June 24, 2025

**VIA ECF**

Hon. Margaret M. Garnett  
United States District Judge  
Southern District of New York  
40 Foley Square, Room 2102  
New York, NY 10007

Re: Valencia Boone v. Riverbay Corp.  
Case No.: 1:24-cv-1263-MMG

Dear Judge Garnett:

We represent Defendant, Riverbay Corp. ("Riverbay") in this matter. We write jointly on behalf of the Parties to apprise the Court of the discovery situation in this matter.

On June 16, 2025, the Parties completed Defendant's witness, Ms. Cooper's, deposition and have completed other outstanding discovery. The Parties have both exchanged their Rule 26(a)(2) disclosures. Plaintiff's expert evaluation is currently scheduled for July 21<sup>st</sup> and will need to complete expert depositions thereafter.

The attorneys hereby request a brief extension to complete expert depositions and expert discovery, while Parties continue with motion practice after the completion of fact discovery. Accordingly, the parties respectfully request an extension of time from June 24, 2025 to August 29, 2025 to complete expert discovery, which shall not affect any other deadlines in this matter.

We thank the Court for its consideration in this regard.

Respectfully submitted,



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cc: Shawn Clark, Esq. (via ECF)

Application GRANTED. The close of expert discovery shall be **August 29, 2025**. In light of the completion of fact discovery and Ms. Cooper's deposition, the Clerk of Court is respectfully directed to terminate Dkt. Nos. 36 & 37 as moot.

The post-fact-discovery conference on Tuesday, July 22, 2025, at 9:30 a.m. shall proceed as scheduled. *See* Dkt. No. 41. The parties are directed to review the Court's Individual Rules & Practices regarding pre-conference correspondence.

The Clerk of Court is respectfully directed to terminate Dkt. No. 42.

SO ORDERED. Date: 6/25/2025.



HON. MARGARET M. GARNETT  
UNITED STATES DISTRICT JUDGE